

**UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT**

**KSENIIA PETROVA,**

Petitioner,

v.

**U.S. DEPARTMENT OF HOMELAND  
SECURITY; KRISTI NOEM**, Secretary of the  
U.S. Department of Homeland Security, in her  
official capacity; **THERESA MESSIER**,  
Superintendent, Chittenden Regional Correctional  
Facility, in her official capacity,

Respondents.

Case No. 2:25-cv-00240-CR

**MOTION TO SET A  
BRIEFING SCHEDULE**

Petitioner, by and through undersigned counsel, respectfully moves this Court to set a briefing schedule in anticipation of the bail hearing scheduled for May 28, 2025. In support of this Motion, Petitioner states the following:

1. On May 14, 2025, this Court scheduled a bail hearing for May 28, 2025, and directed the parties to submit briefing on this Court's habeas authority in advance of the hearing.
2. Later that day, the government arrested Ms. Petrova and transferred her to the custody of U.S. Marshals Service.
3. Ms. Petrova's arrest, relocation to another facility, and the resulting need to secure, brief, and confer with her criminal defense team have significantly reduced the amount of time undersigned counsel had to prepare both the amended complaint and the bail brief, causing a delay in their completion and filing with the Court.

4. This delay has prevented the parties from agreeing on a mutually acceptable briefing schedule. Petitioner proposed the following:

Petitioner's brief due:	<b>May 22, 2025</b>
Federal Respondents' brief due:	<b>May 25, 2025</b>
Petitioner's reply brief due:	<b>May 27, at 12:00pm ET.</b>

5. Federal Respondents' counsel stated the following:

"Federal Respondents' position is that the Court should establish the following briefing schedule: Ms. Petrova's bail brief is due on **May 21, 2025 at 12:00 ET**; Federal Respondents' Response is due on **May 23, 2025**; and, Ms. Petrova's reply is due on **May 27, 2025 at 12:00 ET**. If Ms. Petrova files an amended habeas petition, Federal Respondents request that the Court postpone the May 28, 2025, bail hearing for the reasons stated in the pending motion to postpone."

WHEREFORE, Petitioner respectfully requests that the Court enter an order setting a briefing schedule in advance of the May 28, 2025 bail hearing and granting such other and further relief as the Court deems just and proper.

Dated: May 20, 2025

/s/ Brian Scott Green

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Respectfully submitted,

/s/ Gregory Romanovsky\*

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*Attorneys for Petitioner*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion to Set a Briefing Schedule filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: May 20, 2025

By: /s/ Gregory Romanovsky  
Gregory Romanovsky